

REMARKS

In the non-final Office Action, the Examiner rejected claims 39 and 40 under 35 U.S.C. § 102(e) as anticipated by Pant et al. (U.S. Patent No. 6,012,053); rejected claims 1, 2, 4-6, 11, 13, 17, 18, 22, 24-31, 33, and 37 under 35 U.S.C. § 103(a) as unpatentable over Kirsch et al. (U.S. Patent No. 6,070,158) in view of Armstrong et al. ("WebWatcher: A Learning Apprentice for the World Wide Web," 1995); rejected claims 3, 12, 14-16, 20, and 23 under 35 U.S.C. § 103(a) as unpatentable over Kirsch et al. in view of Armstrong et al. and Pant et al.; rejected claims 7-10 under 35 U.S.C. § 103(a) as unpatentable over Kirsch et al. in view of Armstrong et al. and Page (U.S. Patent No. 6,285,999); rejected claims 19 and 21 under 35 U.S.C. § 103(a) as unpatentable over Kirsch et al. in view of Armstrong et al. and Brown et al. (U.S. Patent No. 6,665,838); rejected claims 32 and 34 under 35 U.S.C. § 103(a) as unpatentable over Kirsch et al.; and rejected claim 38 under 35 U.S.C. § 103(a) as unpatentable over Li (U.S. Patent No. 5,920,859) in view of Perkowitz ("Previous Work," March 1999).

By this Amendment, Applicants cancel claims 1-34, 37, 38, and 40 without prejudice or disclaimer, amend claim 39 to improve form, and add new claims 41-66. No new matter has been added. Claims 39 and 41-66 are pending after entry of this Amendment.

Applicants respectfully traverse the Examiner's rejection of claim 39 under 35 U.S.C. § 102 for at least the reasons presented herein. The Examiner's other rejections are rendered moot due to the cancellation of the previously rejected claims. Applicants respectfully submit that the new claims presented herein are patentable over the references applied by the Examiner for at least the reasons presented herein.

In paragraph 5-1 of the Office Action, the Examiner rejected claim 39 under 35 U.S.C. §

102(e) as anticipated by Pant et al. Applicants traverse the rejection.

A proper rejection under 35 U.S.C. § 102 requires that a single reference teach every aspect of the claimed invention. Any feature not directly taught must be inherently present. In other words, the identical invention must be shown in as complete detail as contained in the claim. See M.P.E.P. § 2131. Pant et al. does not disclose or suggest the combination of features recited in claim 39.

Amended independent claim 39 is directed to a computer-implemented method that comprises identifying a document that is stored on a server in a network and that includes links to linked documents; determining scores for a plurality of the links in the identified document; modifying the identified document based on the determined scores, where the modifying includes reordering at least two of the links based on the determined scores, or sorting at least two of the links based on the determined scores; and providing the modified document to a user.

Pant et al. does not disclose or suggest the combination of features recited in claim 39. For example, Pant et al. does not disclose or suggest determining scores for a plurality of links in a document that is stored on a server in a network. The Examiner alleged that Pant et al. discloses this feature and cited column 1, lines 50-63, column 2, lines 25-43, column 3, lines 30-55, and column 13, lines 9-25, of Pant et al. for support (Office Action, pages 3-4). Applicants disagree.

At column 1, lines 50-64, Pant et al. discloses:

SUMMARY OF THE INVENTION

The present invention provides a mechanism through which results from a search query are ranked according to user-specified relevance factors to allow the user to control how the search results are presented, e.g., their order. The relevance factors are applied to the

results achieved for each query. That is, each item returned by the search has a set of attributes. Each of these attributes is assigned a weight according to the specified relevance factors. These weights are combined to provide a score for the item. The scores of the items control the presentation of search results. The application of the relevance factors does not alter the query performed on the collection of information.

In this section, Pant et al. discloses that results from a search query are scored and ranked according to user-specified relevance factors. Applicants submit that these search results are not a document that is stored on a server in a network, as required by claim 39. Pant et al. specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line 15). Therefore, Pant et al. does not disclose or suggest determining scores for a plurality of links in an identified document that is stored on a server in a network, as required by claim 39.

At column 2, lines 25-43, Pant et al. discloses:

Accordingly, one aspect of the present invention is a computer system for providing user-controllable relevance ranking of search results from a query on a collection of items of information. The computer system includes a relevance determination module having a first input for receiving a set of search results from a query indicating items in the collection matching the query, a second input for receiving an indication of relevance factors specified by a user, and a third input for receiving information about the items in the set of search results to which relevance factors may be applied. This module has an output for providing an indication of a score indicative of relevance for each of the items in the set of search results. A sorting module has an input which receives the score associated with each item and an indication of the set of search results, and an output providing to the user an indication of the items in the set of search results in an order ranked according to the relevance score of each item.

In this section, Pant et al. discloses a relevance determination module that provides a score indicative of the relevance of each item in a set of search results and a sorting module that ranks the items based on their relevance scores. Applicants submit that the relevance determination module and the sorting module are not operating upon links in a document that is stored on a server in a network, but instead are operating upon items in a set of search results. Pant et al.

specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line 15). Therefore, Pant et al. does not disclose or suggest determining scores for a plurality of links in an identified document that is stored on a server in a network, as required by claim 39.

At column 3, lines 28-55, Pant et al. discloses:

In some cases, such as with a search engine for the World Wide Web, or the Internet, the index is accessed by the query engine and the actual documents to be accessed using the results of a query are from a third party source.

A user supplies the search query 106 to the query engine 104 through a user interface 108. The database query engine 104 applies the search query 106 to the database 102 to provide search results 110 which include an indication of the items in the database 102 which match the search query 106. The search results typically include enough information to access the actual item, but generally does not include the entire item in order to reduce the amount of memory needed to process the search results. In the invention, a relevance determination module 112 receives the search results 110 from the database query engine 104 and applies pre-specified relevance factors 114 to each of the corresponding items in the search results 110 to obtain scored search results 116. In particular, each of the items in the search results 110 has a set of attributes associated with it, which the module 112 may use the database 102 to access and identify if such information is not made available in the search results 110. Each of these attributes is given a weight according to the specified relevance factors 114. These weights are combined to provide a score for each item. The scored search results are sorted by sorting module 118 to provide ranked results 120 which are provided to a user interface 122 to be output to the user.

In this section, Pant et al. discloses a relevance determination module that applies relevance factors to each item in a set of search results to obtain scored search results, and a sorting module that sorts the scored search results to provide ranked results. Again, Applicants submit that the relevance determination module and the sorting module are not operating upon links in a document that is stored on a server in a network, but instead are operating upon items in a set of search results. Pant et al. specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line

15). Therefore, Pant et al. does not disclose or suggest determining scores for a plurality of links in an identified document that is stored on a server in a network, as required by claim 39.

At column 13, lines 9-25, Pant et al. discloses:

An example result is shown in FIG. 7. In this embodiment, the scores are shown for each item, but in other embodiments, such scores may be omitted. This search is the result of the query shown at 320 in FIG. 6. Each item includes a hypertext link 330 to the source of the document, a descriptor 332 of the document (usually text taken from the beginning of the document), an indication 334 of the source of the document and an indication of its score, as a function of the maximum score of the retrieved items. FIG. 8 illustrates results achieved with the same query when the relevance factor is the order of the search terms, set at a value of 100. FIG. 9 illustrates the results achieved with the same query when the selected relevance factors are words match, proximity and field, with values set at 100, 100 and 10, respectively. As can be seen from the results, the search query and number of hits remains unchanged, but the presentation of results differs.

In this section, Pant et al. discloses ways in which search results can be presented. As explained above, Pant et al. specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line 15). Therefore, Pant et al. does not disclose or suggest determining scores for a plurality of links in an identified document that is stored on a server in a network, as required by claim 39.

Because Pant et al. does not disclose or suggest determining scores for a plurality of links in an identified document that is stored on a server in a network, Pant et al. cannot disclose or suggest modifying the identified document based on the determined scores, where the modifying includes reordering at least two of the links based on the determined scores, or sorting at least two of the links based on the determined scores, as further recited in claim 39.

The Examiner alleged that Pant et al. discloses this feature and cited column 1, lines 50-63, column 2, lines 25-43, column 3, lines 30-55, and column 13, lines 9-25, of Pant et al. for support (Office Action, pages 3-4). Applicants disagree.

Column 1, lines 50-64, of Pant et al. is reproduced above. In this section, Pant et al. discloses that results from a search query are scored and ranked according to user-specified relevance factors. Applicants submit that these search results are not a document that is stored on a server in a network, as required by claim 39. Pant et al. specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line 15). Therefore, Pant et al. does not disclose or suggest modifying an identified document that is stored on a server in a network based on the determined scores, where the modifying includes reordering at least two of the links based on the determined scores, or sorting at least two of the links based on the determined scores, as required by claim 39.

Column 2, lines 25-43, of Pant et al. is reproduced above. In this section, Pant et al. discloses a relevance determination module that provides a score indicative of the relevance of each item in a set of search results and a sorting module that ranks the items based on their relevance scores. Applicants submit that the relevance determination module and the sorting module are not operating upon links in a document that is stored on a server in a network, but instead are operating upon items in a set of search results. Pant et al. specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line 15). Therefore, Pant et al. does not disclose or suggest modifying an identified document that is stored on a server in a network based on the determined scores, where the modifying includes reordering at least two of the links based on the determined scores, or sorting at least two of the links based on the determined scores, as required by claim 39.

Column 3, lines 28-55, of Pant et al. is reproduced above. In this section, Pant et al. discloses a relevance determination module that applies relevance factors to each item in a set of search results to obtain scored search results, and a sorting module that sorts the scored search results to provide ranked results. Again, Applicants submit that the relevance determination module and the sorting module are not operating upon links in a document that is stored on a server in a network, but instead are operating upon items in a set of search results. Pant et al. specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line 15). Therefore, Pant et al. does not disclose or suggest modifying an identified document that is stored on a server in a network based on the determined scores, where the modifying includes reordering at least two of the links based on the determined scores, or sorting at least two of the links based on the determined scores, as required by claim 39.

Column 13, lines 9-25, of Pant et al. is reproduced above. In this section, Pant et al. discloses ways in which search results can be presented. As explained above, Pant et al. specifically discloses that the search results are not formed into an HTML document until after the search results are scored and ranked (col. 5, line 61 - col. 6, line 15). Therefore, Pant et al. does not disclose or suggest modifying an identified document that is stored on a server in a network based on the determined scores, where the modifying includes reordering at least two of the links based on the determined scores, or sorting at least two of the links based on the determined scores, as required by claim 39.

For at least these reasons, Applicants submit that claim 39 is not anticipated by Pant et al.

New claims 41-46 depend from claim 39. Applicants submit that the other references

applied by the Examiner do not cure the deficiencies in the disclosure of Pant et al. identified above with regard to claim 39. Claims 41-46 are, therefore, patentable over the applied references for at least the reasons given with regard to claim 39.

New independent claim 47 is directed to a computer-implemented method that comprises receiving a search query; providing a list of search results in response to the search query; receiving selection of one of the search results in the list of search results; identifying links in a document corresponding to the selected search result; determining a score for one of the links based on a degree of match between the search query and a content of a linked document pointed to by the one of the links; modifying the document based on the determined score for the one of the links; and providing the modified document.

The references applied by the Examiner, whether taken alone or in any reasonable combination, do not disclose or suggest the combination of features recited in claim 47. For example, the references do not disclose or suggest determining a score for one of the links in a document corresponding to a selected search result based on a degree of match between a search query and a content of a linked document pointed to by the one of the links.

With regard to canceled claim 12, the Examiner alleged that Pant et al. discloses comparing a query with the contents of a linked document and determining a score for the linked document based on a degree of match between the query and the contents of the linked document and cited column 1, lines 50-63, column 2, lines 25-43, and column 3, lines 30-55, of Pant et al. for support (Office Action, page 14). Without acquiescing in the Examiner's allegation, Applicants submit that Pant et al. does not disclose or suggest determining a score for one of the links in a document corresponding to a selected search result in a list of search results based on a

degree of match between a search query and a content of a linked document pointed to by the one of the links, as recited in claim 47.

Column 1, lines 50-64, of Pant et al. is reproduced above. In this section, Pant et al. discloses that results from a search query are scored and ranked according to user-specified relevance factors. Applicants submit that these search results are not a document corresponding to a selected search result in a list of search results, as required by claim 47. Therefore, this section of Pant et al. does not disclose or suggest determining a score for one of the links in a document corresponding to a selected search result in a list of search results based on a degree of match between a search query and a content of a linked document pointed to by the one of the links, as required by claim 47.

Column 2, lines 25-43, of Pant et al. is reproduced above. In this section, Pant et al. discloses a relevance determination module that provides a score indicative of the relevance of each item in a set of search results and a sorting module that ranks the items based on their relevance scores. Applicants submit that the relevance determination module and the sorting module are not operating upon links in a document corresponding to a selected search result in a list of search results, but instead are operating upon search results. Therefore, this section of Pant et al. does not disclose or suggest determining a score for one of the links in a document corresponding to a selected search result in a list of search results based on a degree of match between a search query and a content of a linked document pointed to by the one of the links, as required by claim 47.

Column 3, lines 28-55, of Pant et al. is reproduced above. In this section, Pant et al. discloses a relevance determination module that applies relevance factors to each item in a set of

search results to obtain scored search results, and a sorting module that sorts the scored search results to provide ranked results. Again, Applicants submit that the relevance determination module and the sorting module are not operating upon links in a document corresponding to a selected search result in a list of search results, but instead are operating upon search results. Therefore, this section of Pant et al. does not disclose or suggest determining a score for one of the links in a document corresponding to a selected search result in a list of search results based on a degree of match between a search query and a content of a linked document pointed to by the one of the links, as required by claim 47.

The other references applied by the Examiner do not cure these deficiencies in the disclosure of Pant et al.

Because the applied references do not disclose or suggest determining a score for one of the links in a document corresponding to a selected search result in a list of search results based on a degree of match between a search query and a content of a linked document pointed to by the one of the links, the applied references cannot disclose or suggest modifying the document based on the determined score for the one of the links, as further recited in claim 47.

For at least these reasons, Applicants submit that claim 47 is patentable over the applied references, whether taken alone or in any reasonable combination. New claims 48-51 depend from claim 47 and are, therefore, patentable over the applied references for at least the reasons given with regard to claim 47.

New independent claim 52 is directed to a computer-implemented method that comprises identifying a document that is stored on a server in a network and that includes links to linked documents; determining scores for a plurality of the links in the identified document; comparing

the determined scores to a threshold; deleting one of the plurality of links from the identified document when the score for the one of the links falls below the threshold; and providing, to a user, the identified document without the deleted link.

The references applied by the Examiner, whether taken alone or in any reasonable combination, do not disclose or suggest the combination of features recited in claim 52. For example, the references do not disclose or suggest comparing scores for a plurality of links in a document that is stored on a server in a network to a threshold and deleting one of the plurality of links from the identified document when the score for the one of the links falls below the threshold.

With regard to canceled claim 21, the Examiner alleged that Brown et al. discloses deleting one or more of the entries with scores below a predetermined threshold and cited column 10, lines 25-60, and items 1205-1260 in Figure 12, of Brown et al. for support (Office Action, page 19). Without acquiescing in the Examiner's allegation, Applicants submit that Brown et al. does not disclose or suggest comparing scores for a plurality of links in a document that is stored on a server in a network to a threshold or deleting one of the plurality of links from the identified document when the score for the one of the links falls below the threshold, as recited in claim 52.

At column 10, lines 20-62, and with regard to items 1205-1260 in Figure 12, Brown et al. discloses determining whether a web page includes more than a threshold amount of positive preferences; if the web page does not include more than the threshold amount of positive preferences, then the web page can be altered to indicate the presence of some of the user's criteria; and if the web page includes more than the threshold amount of positive preferences, then the web page is altered to indicate such information. Nowhere in this section, or elsewhere,

does Brown et al. disclose or remotely suggest deleting a link, let alone comparing scores for a plurality of links in a document that is stored on a server in a network to a threshold and deleting one of the plurality of links from the identified document when the score for the one of the links falls below the threshold, as required by claim 52.

The other references applied by the Examiner do not cure these deficiencies in the disclosure of Brown et al.

For at least these reasons, Applicants submit that claim 52 is patentable over the applied references, whether taken alone or in any reasonable combination. New claims 53-58 depend from claim 52 and are, therefore, patentable over the applied references for at least the reasons given with regard to claim 52.

New independent claim 59 is directed to a system that comprises means for identifying a document based on an address associated with the document, the document including links that point to linked documents; means for determining scores for a plurality of the links in the identified document; means for comparing the determined scores to a threshold; means for determining that a score for one of the plurality of links is greater than the threshold; means for determining additional information regarding the linked document pointed to by the one of the plurality of links; and means for providing the identified document with the additional information to a user.

The references applied by the Examiner, whether taken alone or in any reasonable combination, do not disclose or suggest the combination of features recited in claim 59. For example, the references do not disclose or suggest means for comparing scores for a plurality of links in a document that is identified based on an address to a threshold; means for determining

that a score for one of the plurality of links is greater than the threshold; and means for determining additional information regarding the linked document pointed to by the one of the plurality of links.

For at least these reasons, Applicants submit that claim 59 is patentable over the applied references, whether taken alone or in any reasonable combination. New claims 60-66 depend from claim 59 and are, therefore, patentable over the applied references for at least the reasons given with regard to claim 59.

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of the application and the timely allowance of the pending claims.

As Applicants' remarks with respect to the Examiner's rejections overcome the rejections, Applicants' silence as to certain assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to dispute these assertions/requirements in the future.

If the Examiner believes that the application is not now in condition for allowance, Applicants respectfully request that the Examiner contact the undersigned to discuss any outstanding issues.

To the extent necessary, a petition for an extension of time under 35 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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